REMARKS

Favorable reconsideration and allowance of the present application, based on the above amendments and the following remarks, are respectfully requested.

Upon entry of the above amendments, amended claim 15 (now corresponding to previous claim 18/17/15), amended claim 19 and amended claim 20 (corresponding to previous claim 20/15) and 26-32 will be pending. Applicants reserve the right to continue prosecution of the subject matters of previous claims 15-17 and 19 and previously cancelled claims 21-25 and any other disclosed but not claimed subject matter.

The amendment to claim 15 incorporates the subject matter of allowed claim 18 (as dependent on claim 17/15). Therefore, amended claim 15 should be allowable. Claim 19 is amended to include therein the subject matter of allowable claim 18, namely, further containing sulphate, chloride, oxide or mixtures thereof. Therefore, amended claim 19 should also be allowable

Claim 20 is rewritten in independent form in accordance with the embodiment of claim 20/15.

New independent claim 26 corresponds to allowed claim 18/17/16/15. Therefore, claim 26 should be allowable.

New claims 27 and 28 depend from claim 20 and recite the same subject matter as claims 17 and 18, respectively. Accordingly, claims 27 and 28 should be allowable.

New independent claim 29 corresponds to former, allowable claim 20 as dependent on claim 16. Therefore, claim 29 should be allowable. Similarly, claims 30 and 31 depend from claim 29 and recite the subject matters of former claims 17 and 18, respectively, therefore, claims 30 and 31 should be allowable.

Finally, new independent claim 32 corresponds to former claim 20/19 and should be allowable.

The items raised in the Detailed Action will be considered.

Applicants respectfully submits that the newly cited prior art does not anticipate the subject matters of claims 15-17 and 19. However, Applicants have not yet completed the study of the reference disclosure and, therefore, submit the above amendments to place the application in condition for allowance at the earliest possible date.

The receipt of the priority documents is acknowledged with appreciation.



Amendment U.S. Serial No. <u>09/508,923</u> Page 8

A new Declaration in compliance with 37 CFR 1.67(a), identifying the names and addresses of each inventor and identifying this application by serial number and filing date is attached.

The objection to claim 16 is most in view of the cancellation of claim 16 and in further view of the separate presentation, in independent claims, of the different pH ranges from claims 15 and 16.

The objection to claim 19 is also moot in view of the cancellation of claim 16. It is to be noted, however, that the limitation that the compound is obtained as a precipitate from a solution of a mixture of metallic salts which appeared in claims 15 and 16 is not found in claim 19, hence, the scope of claims 16 and 19 were not the same. The same is true with regard to the present claims 29 and 32.

The rejection of claims 15, 16, 17 and 19 under 35 USC 102(b) as anticipated by Raki is most in view of the cancellation of these claims. However, as stated above, applicants reserve the right to continue the prosecution of these claims in a continuation application.



Amendment U.S. Serial No. 09/508,923 Page 9





CONCLUSION

In view of the foregoing, the claims are now believed to be in form for allowance, and such action is hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, he is kindly requested to contact the undersigned at the telephone number listed below.

Attached hereto is a marked-up version of the changes made to the specification and claims by the current amendment. The attached Appendix is captioned "Version with markings to show changes made".

Respectfully submitted,

PILLSBURY WINTHROP LLP

Paul L. Sharer

Registration No. 36,004 Direct No. (703) 905-2180

PLS/RAS 1600 Tysons Boulevard McLean, VA 22102 (703) 905-2000 Telephone (703) 905-2500 Facsimile

Attorney Reference: 081935/0266300

Enclosures:

Appendix

Substitute Declaration

